

Meeting	Senior Leadership Team	Date	30/05/2017
Agenda item	3	Time	10 Minutes
Proactive publication	Yes	Internal publication	Yes
Presenter	Paul Arnold		
Reason for urgency if presented late			

Topic: Deputy Chief Executive Directorate senior leadership resilience.

Issue: A proposal to review the senior leadership and departmental composition of the DCEO directorate and introduce the ICO's DPO role in readiness for GDPR. SLT informally considered the following proposals in mid April. Since then staff and trade unions have been consulted. The proposals now return to SLT for formal consideration and sign off.

Background:

Following the appointment of a permanent DCEO, there is a pressing need to see the senior management roles within the DCEO directorate filled with permanent appointments to ensure stability and continuity. The substantive departmental structure for the directorate as at 31 December 2016 is shown below.

Fig 1.0 – Current Substantive Structure



The recent Corporate Governance review has also highlighted some potential opportunities for improvement in our governance arrangements. We must also make provision within the directorate for a Data Protection Officer in readiness for GDPR and as part of a refreshed internal assurance/accountability framework.

The ICO is growing due to the demands placed on the organisation through a rising profile and major changes in the regulatory environment. The changes proposed in this document are in recognition that the ICO will be a very different organisation in two years time. We will be significantly larger and with greater challenges when it comes to achieving service levels, resourcing our infrastructure and maintaining the necessary standards of governance and compliance for an organisation with in excess of 500 employees. What has worked in the past needs to evolve to continue to work in the future.

It should be noted that the proposal does not impact on the resources identified to focus on the Change Programme. This resource continues to report direct into the DCEO for the duration of the Change Programme.

Discussion:

There are two main parts to the proposal.

Part one: Split of Customer and Business Services

We are proposing to have a separate 'Customer Contact' and a separate 'Business Development and IT' department in place of the substantive Customer and Business Services department shown in Fig 1.0 above.

It is worth noting that until 2014 we had a separate Customer Contact and a separate IT department, each with their own department head. This proposal therefore returns the structure to those arrangements but retains the collaborative working of recent years within the DCEO directorate.

Making this change would essentially establish the interim structure in place since 1 January this year as the substantive structure as shown in Fig 2.0 below.

Fig 2.0 – Current Interim Structure



Implications

Making this change would increase the number of substantive departments in the directorate by one and mean a small number of staff would report to different line managers but without change to their own roles.

The cost of this part of the proposal would be the cost of a further Level G department head role, with this being approximately £65,000 including NI and pensions contributions.

Part two: Creation of Risk and Governance department and introduction of DPO role

A second element of the proposal follows the decision to bring the Corporate Affairs department within the DCEO directorate. At present the Corporate Governance function (including the Private Office) sits within the Corporate Affairs department. The Records and Information Management function (including the Information Access Service) sits within the Customer and Business Services department and the Information Security function sits with the IT Assurance department.

These three governance functions are critical to the ICO's own compliance under GDPR as well as our ability to manage strategic risks and opportunities as the organisation grows and develops.

It is therefore proposed that these three functions join together to form a new 'Risk and Governance' department within the DCEO directorate.

It is also proposed that the head of the new Risk and Governance department would fulfil the role of Data Protection Officer for the ICO, reporting direct to the DCEO/SIRO and alongside the other key roles in the ICO's internal assurance/accountability framework.

The cost of this second part of the proposal would be a further £65,000 to cover the cost of an additional level G Head of Risk and Governance role.

Implications

This part of the proposal would lead to a change of line management for some roles in the directorate but without changes to the roles themselves. For example, the Corporate Governance Group manager and the Information Security Manager. A slight change of job title for the Corporate Governance Group Manager is however likely, with this reflecting the Private Office responsibilities of the post holder.

There are however two roles which would change as a result of this part of the proposal.

The Head of Corporate Affairs would no longer be responsible for Corporate Governance, but this represents a very small part of the present role's daily responsibilities. Whilst a minor amendment may be needed to the Head of Corporate Affairs job role this would not warrant the role being evaluated.

The Corporate Affairs Department would become the Corporate Communications Department as a result of this change.

A further implication of this part of the proposal is for the IT Assurance Department, which effectively loses its department status when the Information Security resources are redeployed to other parts of the DCEO directorate.

The Head of IT Assurance role would remain as our senior technical lead on the technical design and implementation of the ICO's digital and ICT systems and services and our cyber defences. The new look role will however need to be evaluated to consider the impact of this rebalancing of responsibilities given that there will be very little line management responsibility remaining.

Whatever the outcome of this evaluation the role would still report direct to the DCEO/SIRO as the ICO's 'Accreditor' within our internal assurance/accountability framework.

Options:

The two parts of this proposal have been developed to enable them to be accepted in full, rejected entirely or for one to be accepted without the other. These are therefore the options available.

The acceptance of both parts of the proposal is however encouraged as an important step towards establishing a robust leadership structure for the directorate in support of the wider development of the ICO. Below is the proposed future structure for the directorate should both parts of the proposal be accepted.

Fig 3.0 – Proposed Future Structure



Next steps:

If this proposal was accepted then new job roles would need to be created and evaluated for the roles of Head of Risk and Governance as well as the re-shaped senior IT Assurance role.

SLT gave informal agreement to this proposal in early April. Since then those staff involved have been consulted as well as the ICO's PCS and FDA trade unions. All ICO staff were also asked for their comments and feedback via a recent DCEO blog on the intranet.

The proposal therefore returns to SLT formally at this meeting to enable feedback gathered through the consultation to be discussed and a formal decision made in response to the proposal.

If the proposal is formally accepted, recruitment to all agreed vacant positions would then take place as soon as possible. The present interim arrangements would remain in place until then.

